

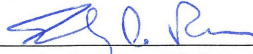
MEMO ENDORSED

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Defendants' motion to seal is
 granted. SO ORDERED.



Edgardo Ramos, U.S.D.J.
 Dated: September 2, 2022
 New York, New York

September 1, 2022

VIA ECF

Hon. Edgardo Ramos, United States District Judge
 Southern District of New York
 Thurgood Marshall United States Courthouse
 Courtroom 619
 40 Foley Square
 New York, NY 10007

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Re: *Vogel v. TakeOne Network Corp. d/b/a Wrapbook, et al.*, No. 22-cv-03991-ER-JLC
 — Motion to Seal

Dear Judge Ramos:

On behalf of Defendants TakeOne Network Corp. d/b/a Wrapbook (“Wrapbook”), Ali Javid, Naysawn Naji, Hesham El-Nahhas, and Cameron Woodward (collectively, the “Defendants”) in the above-referenced matter, I write pursuant to this Court’s Individual Practice Rule 3(ii) to respectfully request permission to file under seal an unredacted version of Defendants’ Motion to Dismiss and supporting documents. Defendants do not believe any portion of the filing contains confidential information that should be filed under seal, and are only seeking permission to do so pursuant to the request of Plaintiff and out of abundance of caution. Pursuant to your Individual Practice Rules and the ECF Rules & Instructions for the United States District Court for the Southern District of New York, a complete set of the documents, with redactions, is filed herewith on the public docket, and a second complete set of documents, with redactions marked by highlighter, is filed herewith under seal.

The specific documents Defendants request permission to file under seal in whole or in part are as follows:

1. Memorandum of Law in Support of the Motion to Dismiss: This document references and quotes from Exhibits 4 and 5, which Defendants seek to file under seal as set forth below.
2. Declaration of Jason R. Burt: This document references the substance of Exhibit 4, which Defendants seek to file under seal as set forth below.

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3. Exhibit 4: Defendants received this document from Plaintiff pursuant to a confidentiality designation as part of a pre-trial mediation, and Plaintiffs have demanded that it be filed under seal. Defendants' position is that the document does not contain any confidential information and should be public. Defendants seek to file the document under seal solely at Plaintiff's request.
4. Exhibit 5: This exhibit is a transcript of the Pre-Motion Conference the Court conducted on August 4, 2022. Defendants position is that this document does not contain any confidential information, but seek to file it under seal because the transcript has not yet been posted to the public docket by the Court. *See* ECF No. 19.

Respectfully submitted,

/s/ Steven N. Feldman
Steven N. Feldman
of LATHAM & WATKINS LLP

cc: All counsel of record (via ECF)